

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF COLUMBIA**

UNITED STATES OF AMERICA

v.

**CONCORD MANAGEMENT AND
CONSULTING LLC,**

Defendant.

Crim. No. 18-CR-32-2 (DLF)

GOVERNMENT’S UNOPPOSED MOTION FOR EXTENSION

The United States of America respectfully requests a one-week extension to provide counsel for defendant Concord Management and Consulting LLC with the additional information identified by the Court at the September 16, 2019 hearing. Counsel for the defendant does not oppose this request.

At the September 16 hearing, the Court ordered the government to identify for defense counsel “every individual or entity that the government will argue at trial is a foreign agent, is a foreign...principal, or is an individual or entity that was required to [file] reports about expenditures to the FEC.” Tr. 9/16/19, at 50:11-15. The Court ordered the government to provide that list to defense counsel by September 27, 2019. *Id.* at 52:11.

The government respectfully requests one additional week to provide this information to defense counsel. The defense will suffer no prejudice from this short delay, as no trial date has been set in this matter, and receiving the information by October 4, 2019 will give the defense plenty of time to use the information in preparation for trial. On September 27, 2019, government counsel contacted defense counsel to request the defense position on this motion for

an extension, and defense counsel advised that the defense does not oppose this request.

Respectfully submitted,

JOHN C. DEMERS
Assistant Attorney General for National Security

JESSIE K. LIU
United States Attorney

By: /s/
Heather N. Alpino
U.S. Department of Justice
National Security Division
950 Pennsylvania Ave. NW
Washington, D.C. 20530
Telephone: (202) 514-2000

By: /s/
Jonathan Kravis
Luke Jones
Kathryn Rakoczy
555 Fourth Street NW
Washington, D.C. 20530
Telephone: (202) 252-6886

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[PROPOSED] ORDER

This matter having come before the Court on the government's unopposed motion for an extension of time, it is hereby ORDERED that the government's motion is granted. On or before October 4, 2019, the government shall provide the defense with the relevant information pursuant to the Court's instructions at the September 16, 2019 status hearing.

Date:

DABNEY L. FRIEDRICH
United States District Judge